

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-30046-KPN

ALICE W. HALPIN,

Plaintiff

v.

RDC OF CONNECTICUT, INC.,
R.D. CLARK AND SONS, INC.,
KATELAND LEASING, INC.,
PINNACLE TRANSPORTATION, INC.
and CHINA GROVE TRANSPORT,
INC.

Defendants

**PARTIES JOINT STATEMENT
PURSUANT TO LOCAL RULE
16.1(D)**

In accordance with the United States District Court for the District of Massachusetts Local Rule 16.1(D) and the Court's Notice of Scheduling Conference, the Plaintiffs and the Defendants met to prepare a Joint Statement setting forth a proposed pre-trial schedule. The parties were able to agree to all of the scheduled items contained herein.

I. **Joint Discovery Plan** – Scheduling the Time and Length of all Discovery Events:

A. **Written Discovery**: All Interrogatories, Requests for Production of Documents and Requests for Admissions shall be served upon opposing counsel by August 1, 2005;

B. **Joinder of Additional Party**: All additional parties are to be joined by August 1, 2005;

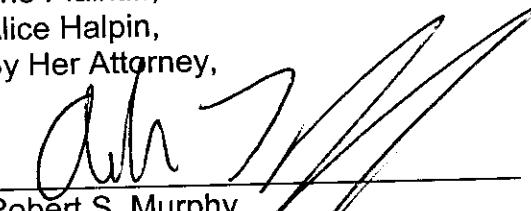
- C. **Deposition of Fact Witnesses:** The depositions of all fact witnesses to be completed by November 1, 2005;
- D. **Identification of Expert Witnesses:** The Plaintiffs shall identify their expert witnesses pursuant to Fed. R. Civ. P. 26(b)(4)(a)(i) by December 1, 2005; The Defendants shall identify all expert witnesses pursuant to Fed. R. Civ. P. 26(b)(4)(a)(i) by January 1, 2006;
- E. **Depositions of Expert Witnesses:** Depositions of all Plaintiffs' experts shall be completed by February 1, 2006; Depositions of all Defendants' experts shall be completed by March 1, 2006;

II. **Proposed Schedule of Filing Motions:** All Fed. R. Civ. P. 56 Motions to be filed by April 1, 2006;

III. **Final Pre-Trial Conference:** A Final Pre-Trial Conference shall be held on May 1, 2006;

IV. **Local Rule 16(D)(1) Certifications:** Certifications signed by the parties, and their counsel, regarding a litigation budget and the feasibility of engaging in alternative dispute resolution is attached to this proposed Pre-Trial Schedule.

The Plaintiff,
Alice Halpin,
By Her Attorney,



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April , 2005

The Defendants,
RDC OF CONNECTICUT, INC.,
R.D. CLARK AND SONS, INC.,
KATELAND LEASING, INC.,
PINNACLE TRANSPORTATION, INC.
and CHINA GROVE TRANSPORT, INC.,
By Their Attorneys,



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